

Kristine M. Akland  
AKLAND LAW FIRM PLLC  
PO Box 7274  
Missoula, MT 59807  
(406) 544-9863  
aklandlawfirm@gmail.com

Thomas Woodbury  
FOREST DEFENSE PC  
618 Rollins St.  
Missoula, MT 59807  
(650) 238-8759  
tom@wildlandsdefense.com

*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

<p>NATIVE ECOSYSTEM COUNCIL, and ALLIANCE FOR THE WILD ROCKIES, Plaintiffs, vs.  JON RABY, Acting State Director, the BUREAU OF LAND MANAGEMENT, DEPARTMENT OF THE INTERIOR, an agency of the United States. Defendants.</p>	<p style="text-align: center;">CV-18-55-SPW-TJC</p> <p><b>MOTION FOR ATTORNEY FEES AND OTHER EXPENSES UNDER THE EQUAL ACCESS TO JUSTICE ACT</b></p>
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Plaintiffs Native Ecosystem Council and Alliance for the Wild  
Rockies files this motion for attorney fees and other costs pursuant to the  
Federal Rules of Civil Procedure Rule 54(d) and the Equal Access to Justice

Act (EAJA) fee provision. 28 U.S.C. §2412. Plaintiffs motion should be granted because they are the “prevailing party,” the Defendants’ position was not substantially justified, and no special circumstances exists to make an award unjust. 28 U.S.C. §2412(d)(1)(A). Additionally, Plaintiffs requested rates and hours are reasonable.

Plaintiffs respectfully requests this Court award \$126,480.00 in attorney fees, \$578.00 in expert witness fees, and \$1,448.01 in taxable and nontaxable costs. Plaintiffs submit a brief in support of this motion.

Defendants have been contact regarding this motion and state that they oppose.

Dated this 8th day of April, 2019.

/s/Kristine M. Akland  
Kristine M. Akland  
AKLAND LAW FIRM PLLC

Thomas Woodbury  
FOREST DEFENSE PC

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that Defendants' counsel, Dean K. Dunsmore, has filed a notice of appearance in this case and therefore will be served via ECF.

/s/ Kristine M. Akland  
Kristine M. Akland  
AKLAND LAW FIRM, PLLC

Attorney for Plaintiffs